

JASON M. FRIERSON
United States Attorney
Nevada Bar Number 7709
DANIEL D. HOLLINGSWORTH
Assistant United States Attorney
Nevada Bar No. 1925
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
Daniel.Hollingsworth@usdoj.gov
Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

KING ISAAC UMOREN,

Defendant.

2:19-CR-064-APG-NJK

**United States of America's Motion to
Approve Sale Price and Sale Terms for
Real Property Located at 991 Feather
Haven Court, Henderson, Nevada 89011**

The United States moves this Court to approve a sale of 991 Feather Haven Court, Henderson, Nevada 89011 (property)¹ for \$350,000.

¹ MORE PARTICULARLY DESCRIBED AS:
PARCEL I:

LOT EIGHT (8) IN BLOCK TWO (2) OF AMENDED PLAT OF A PORTION OF TWO CROWS UNITS 1, 2, 3 AND 4, AS SHOWN BY MAP THEREOF ON FILE IN BOOK 85 OF PLATS, PAGE 23, AND AMENDED BY CERTIFICATE OF AMENDMENT RECORDED DECEMBER 1, 1998 IN BOOK 981201 OF OFFICIAL RECORDS AS DOCUMENT NO. 01274, AND THEREAFTER AMENDED BY CERTIFICATE OF AMENDMENT RECORDED APRIL 19, 1999 IN BOOK 990419 AS DOCUMENT NO. 00496, IN THE OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY, NEVADA.

EXCEPTING THEREFROM AND GRANTING HERETO AN EASEMENT FOR INGRESS AND EGRESS OVER THOSE PORTIONS OF THE LOTS WITHIN SAID SUBDIVISION DELINEATED AS "PRIVATE DRIVE AND UTILITY EASEMENT" ON THE PLAT OF SAID SUBDIVISION.

PARCEL II:

A NON-EXCLUSIVE RIGHT AND EASEMENT OF INGRESS TO, EGRESS FROM AND ENJOYMENT OF THE COMMON ELEMENTS AS SHOWN IN THAT CERTAIN "DECLARATION OF PROTECTIVE COVENANTS, CONDITIONS AND RESTRICTIONS AND GRANT OF RESERVATION OF EASEMENTS FOR EAST HAWLEYWOOD OWNERS ASSOCIATION" RECORDED AUGUST 4, 1998 IN BOOK 980804 AS DOCUMENT NO. 01812, OF OFFICIAL RECORDS, CLARK

1 The reasons for this request are (1) to authorize Doug Sawyer to sell the property for
 2 \$350,000 under the Court-ordered interlocutory sale and (2) to stop the continued increase
 3 of (a) the delinquent Clark County real property taxes, interest, and penalties and (b) HOA
 4 fees, interest, and penalties.

5 This Motion is made and is based on the papers and pleadings on file herein and the
 6 attached Memorandum of Points and Authorities.

7 **Motion and Memorandum of Points and Authorities**

8 This Court authorized the Interlocutory Sale of the property.² Mr. Sawyer listed the
 9 price for \$350,000. Darrin and Michelle Enloe offered \$350,000 to purchase the property. If
 10 this Court does not approve the sale, the Enloes will receive their earnest money deposit.

11 If this Court approves the sale price and sale terms, the proceeds will be accounted
 12 for and distributed according to the terms of the proposed order. The escrow payments are
 13 approximately (1) \$9,195 in real estate taxes; (2) \$19,000 plus lien fees for delinquent HOA
 14 fees; (3) the broker commission at a rate of 6% of the purchase price; (4) \$400 for the
 15 reimbursement of Mr. Sawyer for his resale expenditures related to effecting the sale; and (5)
 16 the remaining proceeds to the government to be held in an interest-bearing account by the
 17 United States Marshal Service, which will constitute the amount to be retained by the Court
 18 as a substitute res under Supp. R. G(7)(b)(iii) and (iv).

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 27 COUNTY, NEVADA, TOGETHER WITH ANY AND ALL IMPROVEMENTS AND
 APPURTENANCES THEREON. APN: 160-33-616-005.

28 ² Order granting 46 Motion for an Interlocutory Order of Sale of 991 Feather Haven Court,
 ECF No. 66.

1 The government has determined that (1) neither the buyer nor any individual who
2 will be on the title after the completion of the sale is a felon; and (2) this sale represents an
3 arms-length transaction.

4 Dated: May 24, 2022.

JASON M. FRIERSON
United States Attorney

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7 /s/ Daniel D. Hollingsworth
DANIEL D. HOLLINGSWORTH
Assistant United States Attorney

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10 IT IS SO ORDERED:

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12 ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE

13 DATED: June 8, 2022
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